IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO.	
		-	

v. : DATE FILED: _____

JULIO PABLO MORALES, : VIOLATIONS:

a/k/a "Pablo Martinez," 21 U.S.C. § 841(a)(1) (possession with

RUBEN VELEZ, : intent to distribute controlled substances -

a/k/a "Roberto Hernandez" 2 counts)

: 18 U.S.C. § 924(c) (possession of a firearm

in furtherance of a drug trafficking crime

: - 1 count)

18 U.S.C. § 922(g)(1) (possession of a firearm by a convicted felon - 2 counts)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about August 30, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendants

JULIO PABLO MORALES, a/k/a "Pablo Martinez," and RUBEN VELEZ, a/k/a "Roberto Hernandez,"

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 50 grams or more, that is, approximately 140 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 30, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendants

JULIO PABLO MORALES, a/k/a "Pablo Martinez," and RUBEN VELEZ, a/k/a "Roberto Hernandez,"

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 500 grams or more, that is, approximately 1,040 grams, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 30, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendants

JULIO PABLO MORALES, a/k/a "Pablo Martinez," and RUBEN VELEZ, a/k/a "Roberto Hernandez,"

knowingly possessed, and aided and abetted the possession of, a firearm, that is, a loaded Smith & Wesson 9mm semi-automatic handgun with serial number VLN6544, in furtherance of a drug trafficking crime for which they may be prosecuted in a Court of the United States, that is, possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(i), and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 30, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

JULIO PABLO MORALES, a/k/a "Pablo Martinez,"

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, and aided and abetted the possession of, in and affecting interstate commerce, a firearm, that is, a loaded Smith & Wesson 9mm semi-automatic handgun, with serial number VLN6544.

In violation of Title 18, United States Code, Sections 922(g)(1) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 30, 2005 in Philadelphia, in the Eastern District of Pennsylvania, defendant

RUBEN VELEZ, a/k/a "Roberto Hernandez,"

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, and aided and abetted the possession of, in and affecting interstate commerce, a firearm, that is, a loaded Smith & Wesson 9mm semi-automatic handgun, with serial number VLN6544.

In violation of Title 18, United States Code, Sections 922(g)(1) and 2.

	A TRUE BILL:
	GRAND JURY FOREPERSON
PATRICK L. MEEHAN UNITED STATES ATTORNEY	